

1

Export Certification
Manual

Introduction

Users and Responsibilities

Contents

Primary Users [page-1-3-1](#)
Secondary Users [page-1-3-1](#)
Experience [page-1-3-1](#)
Responsibilities [page-1-3-1](#)

Primary Users

The ECM is used primarily by Authorized Certification Officials (ACO's) who are responsible for inspecting and certifying plants and plant products and issuing export certificates.

Secondary Users

Other users of the ECM may include Contact Point Officers, supervisors (State plant health directors, regional program managers, port directors, State plant regulatory officials), and members of the plant industry.

Experience

The experience of users will vary, but Authorized Certification Officials (ACO's) must have a working knowledge of the following:

- ◆ PPQ Treatment Manual
- ◆ EXCERPT

Responsibilities

Responsibilities of the Authorized Certification Official (ACO), exporter, and Contact Point Officer (CPO) are detailed below:

Authorized Certification Official (ACO) (PPQ Officer, or State or County Cooperator) Responsibilities:

1. Determine the import requirements of a foreign country for plants or plant products, and then determine whether the products meet the requirements. The Authorized Certification Official (ACO) should examine an import permit or special

authorization, and review the export summary. The Authorized Certification Official (ACO) is not to issue an export certificate for prohibited material unless an import permit or special authorization from the plant protection service of the foreign country is presented. When a product is not eligible for certification or fails inspection, provide the exporter with the information necessary to meet the importing country's requirements.

2. Inspect the plants and plant products before issuing an export certificate to determine that the material meets the import requirements.
3. Advise exporters that they must export plants and plant products within prescribed time limits following inspection. Those time limits are usually specified in the country's export summary. If a time limit is **not** specified in the summary, then the general time limit for certification and exportation is within 30 days after inspection.



Do not issue an export certificate if the time limit has exceeded. Use a bill of lading to identify if the plants or plant products have been inspected and are being shipped within the established time limit. (For specific time limits, see Table 2.4.5 and Table 2.4.6 in the Methods and Procedures Section, General Inspectional Guidelines.

4. Supervise or verify the application of any treatment to prepare the plants or plant products for export.
5. Verify that the contents of the shipment are what has been documented on the export certificate. The Authorized Certification Official (ACO) should compare the export certificate with any supporting documents such as inspection certificates, State certificates, or other agency reports that may help to verify the accuracy of the contents of the shipment and the export certificate.
6. Advise exporters, brokers, and other interested parties as to the status of the shipment. When samples are drawn for laboratory examination or when delays in certifying the shipment occur, the Authorized Certification Official (ACO) should let the exporter or the shipping company know so that the shipment isn't inadvertently loaded before the completion of inspection and certification. Once the inspection is completed and the export certificate issued, the Authorized Certification Official (ACO) immediately should notify the exporter or the shipping company that loading can begin.
7. Prepare export certificates. Some foreign countries will not accept certificates with alterations, errors, or erasures. Unacceptable export certificates will result in shipments being rejected, destroyed, or delayed in release.

Never make corrections to the following areas on the certificate that identify:

- ❖ Name and quantity of plants or plant products
- ❖ Botanical name of plants
- ❖ Number and description of packages
- ❖ Distinguishing marks
- ❖ Additional declaration

If permitted by the foreign country, you may correct minor errors in the other areas of the certificate. Write your initials by the correction(s). Never delete entire entries or use opaque correction fluid. Certificates must be completed in English and legibly handwritten or typed.

8. Forward the record copy of the export certificate to your Contact Point Officer (CPO) no later than seven days after certification. Attach copies of Import Permits (IP's) and any other documents used for the certification of each shipment.
9. Conduct the inspection and certification of plants and plant products at locations normally traveled to in connection with other work assignments and during normal duty hours. Discretion should be used when assigning Authorized Certification Officials (ACO's) to phytosanitary export inspections that involve a significant amount of travel time. When requests for services at remote locations occur, all alternative methods of certification should be explored before PPQ work hours are committed.

Exporter (or Shipper) Responsibilities:

1. Apply for the inspection and certification of each shipment that the shipper wants certified. Certificates can be issued at the point of origin, at a port where the shipment will transit, or at the actual port of export. The application must be in writing and received far enough in advance of the shipping or loading dates to provide for sampling and inspecting. (See [Appendix C, "Application for Inspection and Certification of Domestic Plants and Plant Products for Export \(PPQ Form 572\)" on page-C-1-1](#); also, see [Table 2-4-5, "Time Limits Between Inspection or Date of Issue and Shipping Date," on page-2-4-7](#))
2. Make the shipment available for inspection. Shipments cannot be inspected on board aircraft or ships, or in the holds of vessels. The plants or plant products must be accessible to the Authorized Certification Official (ACO) so that the official can verify and inspect the material described on the application or certificate. In addition, dock papers or other shipping documents

should be marked or stamped to prevent the shipment from being loaded before the inspection is conducted. The exporter is further responsible for providing the labor to open and close packages for inspection and for providing adequate facilities to perform the inspection. Such facilities include supplies, equipment, and proper lighting required for an efficient inspection before certification.

3. Provide for any required treatments, reconditioning, or other actions to meet the import requirements of the foreign country.
4. Export only those plants or plant products that have been properly inspected and certified.
5. Safeguard the certified shipment from infestation between the date the shipment was certified and the actual shipping date.
6. Comply with U.S. export control regulations. Although no special license is required to engage in export trade, the Federal Government controls the exportation of U.S. goods to all foreign countries. The Department of Commerce is the authority for licensing most items for export. Other Federal agencies such as the Agricultural Marketing Service (AMS) and the Federal Grain Inspection Service (FGIS) handle the certification for specific products. For further information, exporters should contact the Office of Export Control, Bureau of International Commerce, Department of Commerce, Washington, DC 20230.

Contact Point Officer (CPO) Responsibilities:

There are designated contact points in each region. At each contact point a key person, the CPO, is responsible for ensuring the quality and credibility of the export certification program. A GS-11 inspector may act as backup for the CPO when assigned export responsibilities. Assigning backup CPO's is an excellent opportunity to get GS-9's or above involved in export activities and relieve the heavy workload of the designated CPO's. In addition, Authorized Certification Officials (ACO's) who want to learn the export program should also be allowed to participate to gain experience for future advancement. As a part of their duties, CPO's are responsible for the following:

1. Review, on a monthly basis, an appropriate number of the Federal Phytosanitary Certificates (FPC's) issued by Authorized Certification Officials (ACO's) for compliance with established policy and foreign import requirements. At a minimum, this review could be in the range of 5 to 10 percent of the total certificates issued for that month. Also, provide the results and give feedback to the issuing office, SPHD and ACO when mistakes are found.

Use the following as guidelines when reviewing State or county issued FPC's:

- ❖ The CPO should instruct the supervisor of the State or county office to review their work unit's FPC yellow copies weekly before sending them to the CPO office. Supervisors should make notes of any major mistakes and document any corrective action taken. This may be written on the FPC yellow copy.
- ❖ The CPO should review 5 to 10 percent of the FPC yellow copies each month. If a particular State or county office has a high number of mistakes, a more intensive review may be necessary.
- ❖ The CPO should keep a log of major mistakes encountered and any corrective action taken. This information can be used as a valuable training tool during certification workshops and refresher training.
- ❖ Major mistakes on FPC's include but are not limited to the following:
 - certifying a prohibited or ineligible product
 - failure to follow an established workplan—failure to follow conditions prescribed in import permits
 - certifying fruit from nonapproved field or treatment facilities
 - failure to inspect a shipment or follow established inspectional procedures
 - missing or incorrect AD's, e.g., adding AD's when not requested by the import permit (IP) or EXCERPT
 - certifying CITES materials at an ineligible port

These mistakes should be documented by the CPO and routed through the State Plant Health Director (SPHD) to the State plant regulatory official (SPRO) who has Statewide responsibility for the export certification program. The SPRO will pass this information on to the Authorized Certification Official (ACO) who made the mistake or their supervisor. (See **Figure 1-3-1** for a sample of this documentation.) If errors continue, retraining or loss of certification as a cooperator in the export program should be considered. If three major mistakes are made in one calendar year, it is PPQ's policy to require mandatory retraining. If the mistakes are deliberate, continuous, or jeopardize the export certification program, then the individual's certification should be revoked (contact Export Services if this action is considered).

To: _____ Date: _____
(insert name of State/County regulatory official)

Recently _____ certified _____ to _____
(insert name of Authorized Certification Official (ACO)) (name of product) (name of country)

on Phytosanitary Certificate # _____ (attached). This FPC has/
has not been reported as rejected by the importing country. The error(s) is/
are as noted below:

- 1 Failed to sign the FPC.
- 2 Certified a prohibited product.
- 3 Failed to follow an established work plan.
- 4 Failed to consult Phytosanitary Notes or other export job aids.
- 5 Failed to compare the validated FPC with the Import Permit.
- 6 Certified fruit from a non-approved field or treatment facility; or failed to include treatment marks on boxes or FPC.
- 7 Issued an improper certificate that resulted in the shipment being rejected by the importing country.
- 8 Failed to follow established inspectional procedures; fruit rejected for quarantine pests.
- 9 Other:

Our records indicate that this is the Authorized Certification Official (ACO)'s _____ warning this past year. Future errors could result in the suspension of the official's certification which allows them to issue Federal Phytosanitary Certificates. Please forward to my office a letter explaining the error(s) and what corrective actions will be taken. This notice is intended as a corrective action to ensure the integrity of the program.

If you have any questions, feel free to contact me at telephone number _____.

_____, Contact Point Officer
(Signature of Contact Point Officer)

FIGURE 1-3-1: Sample of documented errors found on a Federal Phytosanitary Certificate (FPC)

- ❖ Occasional mistakes such as the following can be noted without formal documentation:
 - misspellings
 - blanks
 - missing dates
 - failure to sign documents
 - incorrect country titles
 - unclear abbreviations

➤ incorrect lining out

- ❖ When the CPO feels an issue is going to reach the regional office, the CPO should notify the program manager, who is also the regional contact for the export certification program. The CPO should document the issue by sending a copy of the FPC in question, plus any backup documents, and a short note of explanation.
- ❖ Yellow copies of the FPC's may be destroyed by the CPO after the review process is complete, or the yellow copy may be retained for training material. If the yellow copy is used for training material, always protect the confidentiality of the information. Shredding or burning is appropriate for destroying yellow copies of the FPC. Recycling may be appropriate if you are assured that the confidentiality of the information is maintained. If information is needed on this certificate at a later date, the issuing office can provide a copy of their blue office copy.



The blue file copy is the responsibility of the issuing office. The blue file copy of the FPC should be stored at the issuing office for a minimum of 3 years. It is then archived (stored locally if space is available) for an additional 8 years, then destroyed. Shredding or burning is appropriate for destroying the blue copies of the FPC. Recycling may be appropriate if you are assured that the confidentiality of the information is maintained. (Refer to the user fee section of the export certification manual for further information.)

The Phytosanitary Certificate Issuance Tracking System (PCIT) does not produce color copies. Paper file copies must be maintained following the existing records retention policy for APHIS.

Use the following as guidelines when reviewing Federal issued FPC's:

- ❖ The issuing office supervisor should review the yellow copies of the FPC weekly before sending them to the CPO. Supervisors should make notes of any major mistakes and document any corrective action taken. This may be written on the FPC yellow copy.
- ❖ The CPO should review 5 to 10 percent of the FPC yellow copies each month. If a particular office has a high number of mistakes, a more intensive review may be necessary.
- ❖ When major mistakes are noted, the CPO should discuss the issue with the officer and their supervisor. For repeat mistakes, remedial training may be necessary. If so, work out the procedures and document this action on a training form.

If the officer makes numerous errors, the supervisor should consider not allowing the officer to issue certificates without supervision.

- ❖ Yellow copies of the FPC's may be destroyed by the CPO after the review process is complete, or the yellow copy may be retained for training material. If the yellow copy is used for training material, always protect the confidentiality of the information. Shredding or burning is appropriate for destroying yellow copies of the FPC. Recycling may be appropriate if you are assured that the confidentiality of the information is maintained. If information is needed on this certificate at a later date, the issuing office can provide a copy of their blue office copy.



The blue file copy is the responsibility of the issuing office. The blue file copy of the FPC should be stored at the issuing office for a minimum of 3 years. It is then archived (stored locally if space is available) for an additional 8 years, then destroyed. Shredding or burning is appropriate for destroying blue copies of the FPC. Recycling may be appropriate if you are assured that the confidentiality of the information is maintained. (Refer [“Fees and Costs” on page-A-1-1](#), of this manual for further information.)

Phytosanitary Certificate Issuance Tracking System (PCIT) does not produce color copies. Paper file copies must be maintained following existing records retention policy.

2. Inform Export Services (ES) of the following situations:

- ❖ Where permit requirements are different from summary requirements. For example, when the exporter presents import requirements that differ from those in the summary, the exporter must provide the Authorized Certification Official (ACO) with official documents stating the requirements. The documents may be import permits (IP's), special authorizations, or recent correspondence from the plant protection service of the foreign country. (These new requirements should be brought to the attention of ES.)



An official document from the plant protection service of the foreign country takes precedence over the information contained in the summary.

- ❖ Where an issue may cause embarrassment or financial liability to the USDA or its employees.
- ❖ Where an issue may cause financial loss to the shipper or industry.
- ❖ Where an issue may damage the credibility of the phytosanitary certification program.

3. Serve as liaison between the field and ES by maintaining an active relationship with PPQ officers, other CPO's and Authorized Certification Officials (ACO's) in export certification matters.
4. Determine the need and arrange for the initial or refresher training for PPQ and State/county personnel. Refresher training consists of the following:
 - ❖ A review of summary requirements
 - ❖ An update on changes of policy and procedures
 - ❖ An update and discussion concerning inspectional guidelines
 - ❖ Discussions between participants regarding local problems and situations
 - ❖ A summary of mistakes found when reviewing certificates from the issuing office
5. Ensure that an effective accountability system is established for the FPC's.
6. Participate in an export certification workshop conducted by ES once every 3 years with interim sessions if necessary.
7. Screen and forward a list of State cooperator nominees, along with their qualifications to ES. (See **Appendix F, Cooperative Federal-State Phytosanitary Export Certification Program**)
8. Maintain a record of designated State cooperators, and notify ES of those who retire or otherwise are separated from State employment.
9. Maintain a current copy of Memorandum(s) of Understanding, and review with State cooperators as circumstances warrant (e.g., change in personnel).
10. Maintain up-to-date manuals and associated materials.

